

Exhibit A



Deposition of:
Colleen Taylor , M.D.

July 11, 2017

In the Matter of:

**In Re: Bard IVC Filters Products
Liability**

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF ARIZONA
3
4

5 In re Bard IVC Filters NO. MD-15-02641
6 Products Liability PHX-DGC
7 Litigation
8
9

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11
12 VIDEOTAPED DEPOSITION OF
13 COLLEEN TAYLOR, M.D.
14 July 11, 2017 - 9:47 a.m.
15 Bouhan Falligant
16 One West Park Avenue
17 Savannah, Georgia
18
19
20
21

22 Deborah K. Lingonis, RPR, CCR 2883
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1 Q. Mrs. Jones -- Well, let me just back up for a
2 minute and start that over.

3 This lawsuit, Dr. Taylor, is about an IVC
4 filter that was implanted in Mrs. Jones and explanted
5 from Mrs. Jones except for a piece that broke off
6 before you saw her. I'm not asking you a question.
7 I'm giving you that as background.

8 When she saw you, she had a piece of that
9 filter still in her in her pulmonary artery. Did any
10 of your care and treatment of Mrs. Jones relate to that
11 piece of the filter that was in her pulmonary artery?

12 THE WITNESS: No, sir.

13 MR. GHOSH: Object to the form.

14 BY MR. STOLLER:

15 Q. Let me ask you -- you were asked a number of
16 questions about some documents. So if you would start
17 with Exhibit 5, which is in front of you on your right.
18 Mr. Ghosh asked you some questions about this document
19 which is an X-ray report, correct?

20 A. Correct.

21 Q. You didn't take the X-ray at issue here,
22 correct?

23 A. No, sir.

24 Q. Did you read or interpret the X-ray or the
25 films?